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**From:** Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Sent:** 2/10/2021 6:00:39 PM  
**To:** Rodman, Sonja [Rodman.Sonja@epa.gov]; South, Paul [paul.south@fda.hhs.gov]  
**CC:** Goldman, David [David.Goldman@fda.hhs.gov]; Heard, Alexandra [Alexandra.Heard@fda.hhs.gov]; Nguyen, Thuy [Nguyen.Thuy@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Heard, Alexandra [Alexandra.Heard@fda.hhs.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Anderson, Neil [Anderson.Neil@epa.gov]; Miles, James [miles.james@epa.gov]; Teter, Royan [Teter.Royan@epa.gov]  
**Subject:** RE: PFAS in Pesticide Packaging

Thanks so much, Sonja!

Kimberly Nesci, Director  
Biological and Economic Analysis Division (BEAD)  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-969-9109 (cell)

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**From:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Sent:** Wednesday, February 10, 2021 10:52 AM  
**To:** South, Paul <paul.south@fda.hhs.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Miles, James <miles.james@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Thank you Paul, I was also made aware of this MOU from other EPA contacts yesterday. We will work with you to determine how to best share information. Regards – Sonja

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**From:** South, Paul <Paul.South@fda.hhs.gov>  
**Sent:** Wednesday, February 10, 2021 9:11 AM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Miles, James <miles.james@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Sonja,

Thank you for providing this information. FDA is interested in knowing how fluorinated HDPE containers are being used by industry and we look forward to receiving additional information from you on this issue. As noted below, FDA and EPA have an MOU ( <https://www.fda.gov/about-fda/domestic-mous/mou-225-15-004>) that allows for the sharing of information between agencies. Let me know if you want to discuss the MOU.

Best regards, Paul

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**From:** Rodman, Sonja <Rodman.Sonja@epa.gov>

**Sent:** Tuesday, February 9, 2021 6:40 PM

**To:** South, Paul <Paul.South@fda.hhs.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Miles, James <miles.james@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Good afternoon Paul, I don't believe we have had the opportunity to meet. As Royan indicated, I am the acting branch chief for the Chemical Risk and Reporting Enforcement Branch (CRREB). As you know, we sent an information request letter to [Ex. 6 Personal Privacy (PP)] to obtain additional information about [Ex. 6 Personal Privacy (PP)] and the process they use to fluorinate HDPE containers. Their responses will be coming to us in phases over the next several weeks. We can share the portions of the responses that are not designated Confidential Business Information ("CBI"). As you may know the Toxic Substances Control Act has very stringent requirements related to CBI that significantly restrict our ability to share information identified as CBI. The first set of responses from [Ex. 6 Personal Privacy (PP)] did not contain any CBI are so I am able to share the complete response. This response largely contains general information about the company. We expect to receive another set of responses shortly and I will forward those when I am able. I also look forward to learning more about FDA's experience with fluorinated HPDE containers.

Warm Regards -- Sonja

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**From:** South, Paul <Paul.South@fda.hhs.gov>

**Sent:** Tuesday, February 09, 2021 11:39 AM

**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Miles, James <miles.james@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Hi Sonja,

Just checking on the status of EPA's data request from manufacturers of fluorinated HDPE.

Thanks, Paul

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**From:** Teter, Royan <Teter.Royan@epa.gov>

**Sent:** Monday, February 8, 2021 6:07 PM

**To:** South, Paul <Paul.South@fda.hhs.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Miles, James <miles.james@epa.gov>; Rodman,

Sonja <Rodman.Sonja@epa.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Hello Paul – The information request was issued by our Chemical Risk Reporting Enforcement Branch. I've given Acting Branch Chief Sonja Rodman a heads-up regarding your interest and have copied her here.

Regards,

Royan

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Royan Teter, Chief  
Pesticides and Tanks Enforcement Branch  
U.S. EPA – OECA/OCE/WCED  
(202) 564-0940

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**From:** South, Paul <Paul.South@fda.hhs.gov>  
**Sent:** Monday, February 8, 2021 10:44 AM  
**To:** Teter, Royan <Teter.Royan@epa.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Royan,

Just checking on the status of EPA's data request from manufacturers of fluorinated HDPE.

Thanks, Paul

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**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Sent:** Tuesday, February 2, 2021 1:33 PM  
**To:** South, Paul <Paul.South@fda.hhs.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Paul,

You're welcome, and we're glad to be able to share our work. With regards to the question on information to be provided by Ex. 6 Personal Privacy (PP), this information was requested through our Office of Enforcement and Compliance Assurance. I'm copying Royan Teter and Diana Saenz who can assist you in the status of and access to that information.

Royan and Diana, here is a link to the MOU that Paul referenced, for easy access: <https://www.fda.gov/about-fda/domestic-mous/mou-225-15-004>

Best,  
Kimberly

Kimberly Nesci, Director  
Biological and Economic Analysis Division (BEAD)  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-969-9109 (cell)

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**From:** South, Paul <Paul.South@fda.hhs.gov>  
**Sent:** Tuesday, February 2, 2021 12:43 PM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Kimberly,

Thank you again for meeting with us last week to discuss PFAS in HDPE as well as providing the memo outlining recent EPA work in this area. During our meeting you indicated that EPA had requested information from manufacturers of fluorinated HDPE on how these containers were being used. Using our MOU, is it possible to share this information with FDA?

Thanks, Paul

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**From:** South, Paul  
**Sent:** Tuesday, January 26, 2021 10:30 AM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Thanks Kimberly. We can send out a meeting invite using WebEx for tomorrow (Wednesday 1/27) at 4 pm including you and others at EPA listed below. Thanks again! Paul

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**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Sent:** Tuesday, January 26, 2021 10:08 AM  
**To:** South, Paul <Paul.South@fda.hhs.gov>  
**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>  
**Subject:** RE: PFAS in Pesticide Packaging

Either can work, Paul! I just put a hold on Calendar for Wednesday. Are you planning to send an invite & Teams link?

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**From:** South, Paul <[Paul.South@fda.hhs.gov](mailto:Paul.South@fda.hhs.gov)>  
**Sent:** Tuesday, January 26, 2021 8:33 AM  
**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Cc:** Goldman, David <[David.Goldman@fda.hhs.gov](mailto:David.Goldman@fda.hhs.gov)>; Heard, Alexandra <[Alexandra.Heard@fda.hhs.gov](mailto:Alexandra.Heard@fda.hhs.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Kimberly,

We can actually have the meeting on Wednesday at 4 (not Thursday) if that works for you.

Thanks, Paul

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**From:** South, Paul  
**Sent:** Tuesday, January 26, 2021 7:59 AM  
**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Cc:** Goldman, David <[David.Goldman@fda.hhs.gov](mailto:David.Goldman@fda.hhs.gov)>; Heard, Alexandra <[Alexandra.Heard@fda.hhs.gov](mailto:Alexandra.Heard@fda.hhs.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: PFAS in Pesticide Packaging

Hi Kimberly,

Does Thursday at 4 work for you?

Thanks, Paul

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Sent:** Monday, January 25, 2021 3:48 PM  
**To:** South, Paul <[Paul.South@fda.hhs.gov](mailto:Paul.South@fda.hhs.gov)>  
**Cc:** Goldman, David <[David.Goldman@fda.hhs.gov](mailto:David.Goldman@fda.hhs.gov)>; Heard, Alexandra <[Alexandra.Heard@fda.hhs.gov](mailto:Alexandra.Heard@fda.hhs.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: PFAS in Pesticide Packaging

Paul,

Yes. Right now, Wednesday after 4:00 is open, and Thursday afternoon has some open time as well. Would these work for you? I've included Thuy Nguyen on this message, as well as my management for their awareness. Thuy leads our chemistry laboratory.

Best,  
Kimberly

Kimberly Nesci, Director  
Biological and Economic Analysis Division (BEAD)  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-969-9109 (cell)

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**From:** South, Paul <[Paul.South@fda.hhs.gov](mailto:Paul.South@fda.hhs.gov)>  
**Sent:** Monday, January 25, 2021 3:42 PM  
**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>

**Subject:** FW: PFAS in Pesticide Packaging

Hi Kimberly,

As indicated below, Andrea Drinkard forwarded me your name as EPA contact on a recent issue involving PFAS in pesticide packaging (<https://www.epa.gov/pesticides/pfas-packaging>). If possible, we would like to meet with you to discuss recent EPA testing that shows PFAS contamination of an insecticide from fluorinated high-density polyethylene containers. Is there a good time this week to discuss this issue?

Thanks!

Paul

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**From:** Drinkard, Andrea <Drinkard.Andrea@epa.gov>

**Sent:** Monday, January 25, 2021 2:41 PM

**To:** South, Paul <Paul.South@fda.hhs.gov>; Behl, Betsy <Behl.Betsy@epa.gov>; McLain, Jennifer L. <McLain.Jennifer@epa.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Hi Paul,

Feel free to reach out to our Office of Pesticide Programs lead for testing for PFAS in HDPE containers—Kimberly Nesci, Director of the Biological and Economic Analysis Division. I've copied her here, but I'm also including her contact info below.

Here contact info is:

[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)

703-308-8059

Thanks and please let us know if you have additional questions.

-Andrea-

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**From:** South, Paul <Paul.South@fda.hhs.gov>

**Sent:** Friday, January 22, 2021 5:42 PM

**To:** Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Behl, Betsy <Behl.Betsy@epa.gov>; McLain, Jennifer L. <McLain.Jennifer@epa.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Thanks Andrea

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**From:** Drinkard, Andrea <Drinkard.Andrea@epa.gov>

**Sent:** Friday, January 22, 2021 5:40 PM

**To:** South, Paul <Paul.South@fda.hhs.gov>; Behl, Betsy <Behl.Betsy@epa.gov>; McLain, Jennifer L. <McLain.Jennifer@epa.gov>

**Cc:** Goldman, David <David.Goldman@fda.hhs.gov>; Heard, Alexandra <Alexandra.Heard@fda.hhs.gov>

**Subject:** RE: PFAS in Pesticide Packaging

Hi Paul, thanks for your inquiry. The data comes out of our Office of Chemical Safety and Pollution Prevention. Let me check in with them to see who the best contact will be. As soon as I do that, I'll loop them into this email.

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**From:** South, Paul <[Paul.South@fda.hhs.gov](mailto:Paul.South@fda.hhs.gov)>

**Sent:** Friday, January 22, 2021 5:38 PM

**To:** Behl, Betsy <[Behl.Betsy@epa.gov](mailto:Behl.Betsy@epa.gov)>; Drinkard, Andrea <[Drinkard.Andrea@epa.gov](mailto:Drinkard.Andrea@epa.gov)>; McLain, Jennifer L. <[McLain.Jennifer@epa.gov](mailto:McLain.Jennifer@epa.gov)>

**Cc:** Goldman, David <[David.Goldman@fda.hhs.gov](mailto:David.Goldman@fda.hhs.gov)>; Heard, Alexandra <[Alexandra.Heard@fda.hhs.gov](mailto:Alexandra.Heard@fda.hhs.gov)>

**Subject:** PFAS in Pesticide Packaging

Hi Betsy/Andrea/Jennifer,

David Goldman and I attend the PFAS TWG for FDA. If possible, we would like to meet with you and others at EPA to discuss recent EPA testing that shows PFAS contamination of an insecticide from fluorinated high-density polyethylene containers (<https://www.epa.gov/pesticides/pfas-packaging>).

Please let me know if there is a good day/time next week to meet.

Thanks,

Paul

*Paul South, Ph.D.*

*Director, Division of Plant Products and Beverages*

*Office of Food Safety*

*Center for Food Safety and Applied Nutrition*

*U.S. Food and Drug Administration*

*Email: [Paul.South@fda.hhs.gov](mailto:Paul.South@fda.hhs.gov)*

*Phone: 240-402-1640*

